

## FEDERAL ELECTION COMMISSION

WASHINGTON, DIC 20463.

RO-2

MAR 23 1994

William J. McManus, Treasurer Republican National Committee 310 First Street, SE Washington, DC 20003

Identification Number: C00003418

Reference: April Monthly Report (3/1/93-3/31/93)

Dear Mr. McManus:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(1) of the Detailed Summary Page of your report discloses a total of \$413,734.32 in itemized contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$410,634.32. This discrepancy appears to be caused by the omission of page 45 of your Schedule A. Please amend your report to clarify the discrepancy.

-Your report does not include a Schedule #1 to allocate administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR \$106.5(b)(2), (d)(1), (d)(2) and 11 CFR \$104.10(b)(1)(ii)(B) and 106.6(c)

-Please provide the name of the federal candidate supported in the Texas special election for the coordinated expenditure(s) disclosed on Schedula F.

-Schedule H3 discloses receipt of \$9,358.95 from your non-federal account for a fundraising event(s) which is listed as 100% non-federal on Schedules H2 and H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR \$106.5(g)(i). However, a 100% non-federal

fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends that you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to provide the EVENT YEAR-TO-DATE totals for all administrative expenditures. Please amend your report to include the missing EVENT YEAR-TO-DATE totals.

-NOTE: You have disclosed transfers-in from your non-federal account on Schedule A and on Schedule H3 supporting Line 18. Be advised that these transfers should only be disclosed on Schedule H3 in order to avoid inflated transfer totals.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

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Sincerely,

Any Suzanne Reynolds

Reports Analyst

Reports Analysis Division